



OCT -6 2009

Dr. F. Dominic Dottavio
President
Tarleton State University
1333 West Washington
Stephenville, TX 76401

Sent Via Federal Express
Tracking #: 7979 9593 0840

OPE-ID: 00363100

Dear Dr. Dottavio:

This letter is to inform you that the U.S. Department of Education (Department) intends to fine Tarleton State University (TSU) \$137,500 based on the violations of statutory and regulatory requirements outlined below. This fine action is taken in accordance with the procedures that the Secretary of Education (Secretary) has established for assessing fines against institutions participating in any or all of the programs authorized under Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 *et seq.* (Title IV, HEA programs). Under the Department's regulations, the Department may impose a fine of up to \$27,500 for each violation. 34 C.F.R. § 668.84. As detailed below, this fine action is based on TSU's failure to comply with the requirements of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (the Clery Act) in Section 485(f) of the HEA, 20 U.S.C. § 1092(f), and the Department's regulations in 34 C.F.R. §§ 668.41 and 668.46.

Under the Clery Act, institutions participating in the Title IV, HEA programs must prepare, publish, and distribute an annual security report by October 1 of each year. 34 C.F.R. § 668.41(e). The annual security report must include a description of the institution's campus security policies in specific areas. 34 C.F.R. § 668.46(b). In addition, the annual security report must report statistics for the three most recent calendar years concerning the occurrence of certain crimes on campus, in or on certain non-campus buildings or property, and on public property. 34 C.F.R. § 668.46(c). The crimes that must be reported include: criminal homicide (murder and manslaughter); sex offenses (forcible and non-forcible); robbery; aggravated assault; burglary; motor vehicle theft; arson; and arrests for liquor law violations, drug law violations and illegal weapons possession. An institution must also specifically report on any crime that manifests evidence of a hate crime. 34 C.F.R. § 668.46(c). An institution must, in a manner that is timely and that will aid in the prevention of similar crimes, report to the campus

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community about such crimes, and about crimes considered by the institution to represent a threat to its students and employees. 34 C.F.R. § 668.46(e). The annual security report must be distributed to current students and employees and must be made available to applicants for admission and employment to provide them with accurate, complete and timely information about crime and safety on campus. 34 C.F.R. § 668.41(e). An institution that maintains a campus police or a campus security department must maintain a written, easily understood daily crime log. 34 C.F.R. § 668.46(f). Institutions must submit the crime statistics annually to the Department, which makes them publicly available. 34 C.F.R. § 668.41(e)(5).

In April 2007, the Department received a complaint that TSU was not reporting accurate crime statistics in violation of the Clery Act. The complaint was based on articles in TSU's campus newspaper, which reported that TSU underreported the number of burglaries and sexual assaults. The Department asked TSU for a response to the complaint. In its reply dated July 5, 2007, TSU asserted that it was meeting all of the requirements of the Clery Act.

During the week of April 21 through April 25, 2008, the Department conducted a program review at TSU. The focus of the review was TSU's compliance with the Clery Act. The review consisted of an examination of TSU's crime statistics for calendar years 2005 and 2006. On February 18, 2009, the Department issued a Program Review Report to TSU, which included the Department's findings that TSU had not complied with the Clery Act and with the Department's implementing regulations. On April 14, 2009, the Department received TSU's final response to the Program Review Report. The Department issued its Final Program Review Determination (FPRD) letter to TSU on June 10, 2009. The FPRD is incorporated by reference into this fine action. (Enclosure 1).

The Department is taking this fine action based on the findings in the FPRD, which concluded that TSU failed to accurately report its crime statistics by omitting several incidents.

TSU FAILED TO REPORT SEVERAL INCIDENTS IN ITS CRIME STATISTICS

Federal regulations require that institutions participating in the Title IV, HEA programs compile and publish for the three most recent calendar years, accurate and complete campus crime statistics to inform current and prospective students and employees of important safety and security information. 34 C.F.R. § 668.46(c)(1). An institution must record a crime statistic in its annual security report for the calendar year in which the crime was reported to a campus security authority. 34 C.F.R. § 668.46(c)(2). The statistical reporting must be disclosed and made available as part of the institution's annual security report by October 1 of each year, and it must be electronically submitted to the Department for its inclusion in the Campus Crime and Security Website. The Department has established timeframes within which institutions must electronically submit that information. 34 C.F.R. §§ 668.41(e)(1) – (e)(5).

TSU did not provide accurate crime statistics to its students and employees via the annual security report or to the Department. In particular, the Department has determined that TSU did not comply with the Clery Act reporting requirements for its 2006 annual security report. TSU's 2006 annual security report underreported the number of crimes for calendar years 2003, 2004 and 2005. TSU underreported the number of forcible sex offenses, burglaries and drug law violations in its crime statistics. By excluding these incidents from the annual security report, TSU misrepresented the amount of crime on and around its property. TSU's failure to correctly compile and maintain its crime statistics resulted in incorrect information being reported to the Department in 2006. As a result of these incorrect reports from the school, the Department's website did not provide correct information to the public regarding crime at TSU.

TSU published its 2006 annual security report on September 1, 2006. That report contained the following statistics for the 2003, 2004, and 2005 calendar years:

	2003/2004/2005			
	On Campus	Residence Halls	Non-Campus	Public Property
Murder/Non-negligent manslaughter	0/0/0	0/0/0	0/0/0	0/0/0
Negligent manslaughter	0/0/0	0/0/0	0/0/0	0/0/0
Sex offenses – Forcible	0/0/0	0/0/0	0/0/0	0/0/0
Sex offenses – Non-forcible	0/0/0	0/0/0	0/0/0	0/0/0
Aggravated assault	0/0/0	0/0/0	0/0/0	0/0/0
Robbery	0/0/0	0/0/0	0/0/0	0/0/0
Burglary	10/13/6	7/6/4	0/0/0	0/0/0
Motor vehicle theft	0/0/4	0/0/4	0/0/0	0/0/0
Arson	0/0/0	0/0/0	0/0/0	0/0/0
Any other crime	0/0/0	0/0/0	0/0/0	0/0/0
Arrests for liquor law violations	0/0/0	27/12/26	0/0/0	10/3/8
Arrests for drug law violations	7/11/2	5/6/1	0/0/0	0/0/0
Arrests for illegal weapons possession	0/0/0	0/0/0	0/0/0	3/1/8
Referrals for liquor law violations	20/9/30	19/6/26	0/0/0	0/0/0
Referral for drug law violations	2/2/2	2/2/2	0/0/0	0/0/0
Referrals for illegal weapons possession	0/0/0	0/0/0	0/0/0	0/0/0

On April 12, 2007, two articles were published by *The J-TAC*, TSU's campus paper. These articles stated that TSU had underreported forcible sex offenses and burglary crime statistics for several years. In particular, the newspaper noted that of 10 sex offenses reported to the TSU police department between 2002 and 2007, six were disclosed in daily crime logs as sexual assaults. Three of the four remaining incidents were categorized as assaults with no mention of their sexual nature. The article quoted TSU's

former police chief, Robert Hooper, as stating, “[a]s I understand it, if there’s a report given to a university official and if it’s one of our covered areas, then it has to be at least mentioned...and if we’ve missed any of those, I don’t know about them”. However, according to the news article, none of the 10 sex offenses detailed in police reports had been included in the crime statistics provided to students and employees and to the Department in accordance with the Clery Act. TSU had not included any sexual offenses in its crime statistics since 2000. The article also quoted Dr. Koy Floyd, TSU’s Vice President for Institutional Advancement as stating that none of the reports of sexual offenses “were reported to the Department of Education under the Clery Act since they didn’t meet the minimum elements of a possible sexual offense”. In some cases, he said, students who accuse others of sexual offenses decide against pressing charges. In other cases, what was reported to police as a sexual assault turned out to be a simple assault. “Even though they initially wrote it down as sexual assault, when they started giving details...it was unfounded,” he said. According to the news article, “five of the 10 sex offenses were labeled as unfounded. Two cases were cleared by arrest, one required ‘further investigation’, one was referred to the Stephenville police, and the final case was labeled ‘cleared by exception’.”

For Clery Act purposes, an incident is considered to be reported to an institution when it is brought to the attention of a campus police, security, or other campus security authority. 34 CFR § 668.46(a)(“campus security authority”), (b)(2)(iii) and (c)(2). No requirement exists that a criminal report be made to, or investigated by, the police or a security officer or that a finding of guilt or responsibility result. An institution may only exclude incidents that have been officially unfounded (i.e., a determination is made by a law enforcement officer that an incident did not occur).

According to the news article related to unreported burglaries, TSU disclosed to the Department 29 burglaries on campus between 2003 and 2005. However, police records for the same period reflected more than 60 burglaries. The article stated further, “[u]niversity officials said more than 60 burglaries documented in police reports differ from the 29 publicly disclosed under Clery because of the ways burglaries are counted and the definition of burglary”. The article quoted TSU’s police chief as stating that a series of burglaries that occurred in one dormitory was to be counted as a single offense under the Clery Act. However, in accordance with the Federal Bureau of Investigation’s Uniform Crime Reporting (UCR) Handbook, the Department’s Handbook for Campus Crime Reporting, states “each room is considered to be a separate dwelling” in a residence hall and/or campus dormitory. Therefore, each individual burglary is counted as a separate incident. Mr. Hooper, TSU’s former police chief was also quoted as stating, “another reason the numbers don’t match depends on whether force was used in the burglary. If someone enters a building without using force, and steals something...that is not considered a burglary that must be disclosed.” That is not correct. The UCR and the Department’s Handbook for Campus Crime Reporting define burglary as “the unlawful entry of a structure to commit a felony or a theft” and includes details on forcible and non-forcible entries, all of which must be reported.

The articles, which refer to specific dates and incidents, were forwarded to the Département. On June 15, 2007, the Department asked TSU to respond to the allegations made in the articles. TSU responded on July 5, 2007, with a brief letter stating that, “[a]fter reviewing the Department of Education’s *Handbook for Campus Crime Reporting*, we have determined that the University is meeting all of the requirements of the Clery Act.” However, TSU neglected to mention in its response to the Department that it had revised its 2006 annual security report in May 2007.

The Department determined that TSU’s July 5, 2007 response was inadequate and decided to conduct a program review focused on Clery Act reporting requirements. The review was conducted from April 21 – 25, 2008. The Department did not learn that TSU had changed its reported crime statistics until the reviewers were on-site during the program review.

The Department discovered that TSU replaced the inaccurate online version with a revised 2006 annual security report on or about May 22, 2007. The program reviewers found no evidence to demonstrate that TSU had notified students or the public of this revision. The revised report included three forcible sex offenses, one robbery, 35 burglaries, 22 arrests for drug law violations and one referral for drug law violations that had not been included in TSU’s original report published on September 1, 2006. The May 2007 revision acknowledged that TSU had improperly excluded the three forcible sex offenses and one robbery, and had seriously underreported the number of burglaries and arrests for drug and liquor law violations. The revised report contained the following revised crime statistics for the 2003, 2004 and 2005 calendar years:

	2003/2004/2005			
	On Campus	Residence Halls	Non-Campus	Public Property
Murder/Non-negligent manslaughter	0/0/0	0/0/0	0/0/0	0/0/0
Negligent manslaughter	0/0/0	0/0/0	0/0/0	0/0/0
Sex offenses – Forcible	0/1/2	0/1/2	0/0/0	0/0/0
Sex offenses – Non-forcible	0/0/0	0/0/0	0/0/0	0/0/0
Aggravated assault	0/0/0	0/0/0	0/0/0	0/0/0
Robbery	1/0/0	0/0/0	0/0/0	0/0/0
Burglary	21/32/11	19/30/8	0/0/1	0/0/0
Motor vehicle theft	0/0/4	0/0/4	0/0/0	0/0/0
Arson	0/0/0	0/0/0	0/0/0	0/0/0
Any other crime	0/0/0	0/0/0	0/0/0	0/0/0
Arrests for liquor law violations	33/15/39	27/12/21	0/0/0	10/3/8
Arrests for drug law violations	7/11/2	5/6/1	0/0/0	5/1/0
Arrests for illegal weapons possession	0/0/0	0/0/0	0/0/0	3/1/2
Referrals for liquor law violations	20/9/30	19/6/26	0/0/0	2/0/0

Referral for drug law violations	2/3/2	2/2/2	0/0/0	0/0/0
Referrals for illegal weapons possession	0/0/0	0/0/0	0/0/0	0/0/0

During the program review process, Sergeant John Hutson and Lieutenant Randy Dolloff, TSU police department personnel, stated that their understanding of Clery Act requirements was incomplete when the crime statistics for the 2006 annual security report were initially compiled, but that the crime statistics were revised after learning more about the Clery Act reporting requirements.

Although TSU's revised 2006 annual security report included additional crimes that should have been included in the original report, the Department's program review identified additional reportable incidents that were not included in the revised report. The Department's program reviewers examined TSU's police incident reports for calendar years 2005 and 2006 and identified an additional four burglaries, six arrests for drug law violations and two referrals for drug law violations that had not been included in the institution's revised annual security report. All of the incidents occurred in the 2005 calendar year.

In its response to the Program Review Report, TSU concurred with the Department's determination that it underreported the number of burglaries, drug law violation arrests and drug law referrals that occurred in the 2005 calendar year. TSU agreed that sixteen burglaries, eight drug law violation arrests and four drug law referrals occurred in the 2005 calendar year but had not been included in the crime statistics.

On or about April 7, 2009, TSU corrected the crime statistics in its annual security report on its website to reflect the correct number of incidents. In addition, on or about April 7, 2009, TSU submitted to the Department updated crime statistics information.

TSU's failure to distribute accurate and complete crime statistics resulted in incorrect information being given to TSU's current and prospective students, employees, and the public. TSU did not provide its students, employees, and potential students and employees and the public with an accurate picture of crime at TSU. Moreover, TSU's failure to timely distribute accurate and complete crime statistics deprived the campus community of important security information and, thus, constituted a misrepresentation of safety and security on campus. Therefore, the campus community was not fully informed, in accordance with Clery Act requirements, to adequately provide for its own safety and security and that of others. TSU's correction of the crime statistics after the fact does not excuse its earlier failure to comply with its legal obligations. The correction of violations does not diminish the seriousness of not correctly reporting these incidents at the time they occurred.

II.

In determining the amount of a fine, the Department considers both the gravity of the offense and the size of the institution. 34 C.F.R. § 668.92. Pursuant to the Secretary's

decision in In the Matter of Bnai Arugath Habosem, Docket No. 92-131-ST (August 24, 1993), the size of an institution is based on whether it is above or below the median funding levels for the Title IV, HEA programs in which it participates. The latest year for which complete funding data is available for TSU is the 2007-08 award year. According to Department records, TSU received approximately \$7,360,551 in Federal Pell Grant funds; approximately \$38,568,635 in Federal Family Educational Loan (FFEL) funds and approximately \$464,387 in Campus-Based funds. The amount of Title IV, HEA program funds received by or on behalf of students attending TSU is set forth in Enclosure 2 to this letter. The latest information available to the Department indicates that the median funding level for institutions participating in the Federal Pell Grant program is \$927,672; for institutions participating in the FFEL and/or Federal Direct Loan program, the median funding level is \$2,384,891, and for institutions participating in the Campus-Based programs, the median funding level is \$268,407. Accordingly, the Department will consider TSU a large institution because its overall funding level exceeds the median funding levels.

The inaccurate information presented by TSU as a result of its failure to comply with the HEA and the Department's regulations deprived the campus community of vital information on campus security and denied individuals the opportunity to take adequate steps to provide for their own safety and that of others. Therefore, TSU's failure to comply with the Clery Act amounts to a substantial misrepresentation under 34 C.F.R. § 668.72 and warrants the imposition of a fine as described below.

After considering the gravity of the violations and the size of the institution, I have assessed \$27,500 for each of the three forcible sex offenses that TSU failed to report in its original 2006 annual security report and statistics provided to the Department. In addition, I have assessed a \$55,000 fine for TSU's failure to accurately compile and report other incidents, thus underreporting its crime statistics. In particular, I have assessed a \$27,500 fine for the one robbery, 35 burglaries, 22 arrests for drug law violations and one referral for drug law violations that TSU failed to report in its original annual security report but included in its revised report published on May 22, 2007. In addition, I have proposed a \$27,500 fine for the additional four burglaries, six arrests for drug law violations and two referrals for drug law violations incidents that TSU failed to report in its revised report, but which were subsequently identified by the Department during its on-site review of the institution's police reports. Despite TSU's July 5, 2007 assertion that it was meeting all of the requirements of the Clery Act, the Department's program review dispelled that claim. If an institution does not accurately report its statistics, students, employees and the public are unable to make informed decisions about the safety of the campus community.

The fine of \$137,500 will be imposed on October 28, 2009, unless I receive, by that date, a request for a hearing or written material indicating why the fine should not be imposed. TSU may submit both a written request for a hearing and written material indicating why a fine should not be imposed. If TSU chooses to request a hearing or submit written material, you must write to me at:

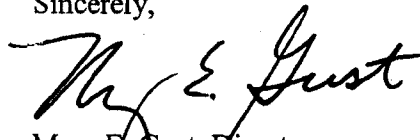
Administrative Actions and Appeals Division
U.S. Department of Education
Federal Student Aid/Program Compliance
830 First Street, NE - UCP-3, Room 84F2
Washington, DC 20002-8019

Upon receipt of such a request, the case will be referred to the Office of Hearings and Appeals, which is a separate entity within the Department. That office will arrange for assignment of TSU's case to hearing official who will conduct an independent hearing. TSU is entitled to be represented by counsel at the hearing and otherwise during the proceedings. If TSU does not request a hearing but submits written material instead, I will consider that material and notify TSU of the amount of fine, if any, that will be imposed.

ANY REQUEST FOR A HEARING OR WRITTEN MATERIAL THAT TSU SUBMITS MUST BE RECEIVED BY OCTOBER 28, 2009; OTHERWISE, THE \$137,500 FINE WILL BE EFFECTIVE ON THAT DATE.

If you have any questions or desire any additional explanation of TSU's rights with respect to this action, please contact Lauren Pope of my staff at 202/377-4282.

Sincerely,

A handwritten signature in black ink, appearing to read "Mary E. Gust". The signature is fluid and cursive, with the first name "Mary" and last name "Gust" being the most prominent parts.

Mary E. Gust, Director
Administrative Actions and Appeals Division

Enclosures

Enclosure 1



COPY

June 10, 2009

Dr. F. Dominic Dottavio
President
Tarleton State University
1333 West Washington
Stephenville, TX 76401

Certified Mail
Return Receipt Requested

No. 7007 3020 0000 2587 9039

RE: **Final Program Review Determination**
OPE ID: 00363100
PRCN: 200830626734

Dear Dr. Dottavio:

The U.S. Department of Education's (Department's) School Participation Team - Dallas issued a program review report on February 18, 2009, covering Tarleton State University's (TSU's) compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (the Clery Act). The findings of that review are presented in the enclosed final program review determination (FPRD).

Purpose:

Final determinations have been made concerning the outstanding finding of the program review report. The purpose of this letter is to: (1) close the review, and (2) notify TSU of a possible adverse administrative action. This FPRD is being referred to the Administrative Actions and Appeals Division (AAAD) for consideration of possible adverse administrative action. Such action may include a fine, or the limitation, suspension or termination of the eligibility of the institution pursuant to 34 C.F.R. Part 668, Subpart G. If AAAD initiates any action, a separate notification will be provided which will include information on institutional appeal rights and procedures to file an appeal.

Record Retention:

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. §§ 668.24(e)(1), (e)(2), and (e)(3).

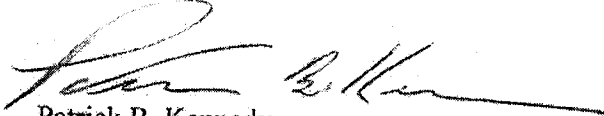
Federal Student Aid, School Participation Team - Dallas
1999 Bryan Street, Suite 1410, Dallas, TX 75201-6817
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Tarleton State University
OPE ID 00363100
PRCN 200830626734
Page 2 of 2

The Department expresses its appreciation for the courtesy and cooperation extended during the review. If the institution has any questions regarding this letter, please contact Mr. Jesus Moya at (214) 661-9472.

Sincerely,



Patrick B. Kennedy
Area Case Director

Enclosure

cc: Mr. Justin Williams, Chief of Police, Tarleton State University Police Department
Mr. David Linkletter, Texas Higher Education Coordinating Board
Dr. Belle S. Wheelan, President, Southern Association of Colleges and Schools
Commission on Colleges
Ms. Carol Lindsey, Vice President of Policy and Compliance, Texas Guaranteed Student
Loan Corporation

Prepared for

Tarleton State University



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FEDERAL STUDENT AID

OPE ID 00363100

PRCN 200830626734

Prepared by:

U.S. Department of Education

Federal Student Aid

School Participation Team - Dallas

Final Program Review Determination

June 10, 2009

1999 Bryan Street, Suite 1410
Dallas, TX 75201-6817
www.FederalStudentAid.ed.gov

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A. Institutional Information

Tarleton State University
1333 West Washington
Stephenville, TX 76401

Type: Public

Highest Level of Offering: Master's Degree or Doctor's Degree

Accrediting Agency: Southern Association of Colleges and Schools Commission on Colleges

Current Student Enrollment: 8,922 (2007-08)

% of Students Receiving Title IV: 49.7% (2007-08)

Title IV Participation

	2007-08
Federal Pell Grant Program	\$ 7,360,551
Federal Supplemental Educational Opportunity Grant Program (FSEOG)	\$ 339,496
Federal Work-Study Programs (FWS)	\$ 124,891
Federal Family Education Loan Program (FFEL)	\$38,568,635

Default Rate FFEL/DL:	2006	5.2%
	2005	4.1%
	2004	5.4%

Default Rate Perkins:	2007	12.5%
	2006	5.0%
	2005	24.1%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Tarleton State University (TSU) from April 21-25, 2008. The review was conducted by Mr. Jesus Moya and Mr. Michael Rhodes of the Dallas School Participation Team, and Mr. James Moore of the Philadelphia School Participation Team.

The focus of the review was TSU's compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (the Clery Act). The review consisted of an examination of TSU's crime statistics for calendar years 2005 and 2006.

Disclaimer:

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning TSU's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve TSU of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

C. Findings and Final Determinations

Resolved Finding with Comments

The following program review finding has been resolved by the institution, and may be considered closed. This finding is included solely for the purpose of discussing resolution of the finding. The program review report finding, as it was written in the Department's February 18, 2009 Program Review Report, is quoted verbatim below in italics.

Finding 1. Failure to Accurately Report Crime Statistics

Citation: Institutions are required to publish and distribute, by October 1 of each year, an annual security report that contains required crime statistics, as well as required statements and policies, to its current students and employees. Institutions must also inform prospective students and employees of the report's availability and provide a copy upon request.

The annual security report must report crime statistics for the three most recent calendar years concerning the occurrence on campus, in or on noncampus buildings or property, and on public property of the following offenses:

- *Murder and nonnegligent manslaughter;*
- *Negligent manslaughter*
- *Sex offenses (forcible sex offenses and nonforcible sex offenses);*

- *Robbery;*
- *Aggravated assault;*
- *Burglary;*
- *Motor vehicle theft;*
- *Arson;*
- *Arrests for liquor law violations, drug law violations, and illegal weapons possession; and*
- *Persons not included in the above category who were referred for campus disciplinary action for liquor law violations, drug law violations, and illegal weapons possession.*

34 C.F.R. § 668.46 (the implementing regulations of the The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act or Clery Act)

Noncompliance: TSU failed to report several crime incidents in the crime statistics it published in its 2006 annual security report.

TSU published its 2006 annual security report on September 1, 2006. That report contained the following statistics for the 2003, 2004, and 2005 calendar years:

	2003 / 2004 / 2005			
	On Campus	Residence Halls	Non-Campus	Public Property
<i>Murder/Non-negligent manslaughter</i>	0/0/0	0/0/0	0/0/0	0/0/0
<i>Negligent manslaughter</i>	0/0/0	0/0/0	0/0/0	0/0/0
<i>Sex offenses - Forcible</i>	0/0/0	0/0/0	0/0/0	0/0/0
<i>Sex offenses -- Non-forcible</i>	0/0/0	0/0/0	0/0/0	0/0/0
<i>Aggravated assault</i>	0/0/0	0/0/0	0/0/0	0/0/0
<i>Robbery</i>	0/0/0	0/0/0	0/0/0	0/0/0
<i>Burglary</i>	10/13/6	7/6/4	0/0/0	0/0/0
<i>Motor vehicle theft</i>	0/0/4	0/0/4	0/0/0	0/0/0
<i>Arson</i>	0/0/0	0/0/0	0/0/0	0/0/0
<i>Any other crime</i>	0/0/0	0/0/0	0/0/0	0/0/0
<i>Arrests for liquor law violations</i>	0/0/0	27/12/26	0/0/0	10/3/8
<i>Arrests for drug law violations</i>	7/11/2	5/6/1	0/0/0	0/0/0
<i>Arrests for illegal weapons possession</i>	0/0/0	0/0/0	0/0/0	3/1/8
<i>Referrals for liquor law violations</i>	20/9/30	19/6/26	0/0/0	0/0/0
<i>Referrals for drug law violations</i>	2/2/2	2/2/2	0/0/0	0/0/0
<i>Referrals for illegal weapons possession</i>	0/0/0	0/0/0	0/0/0	0/0/0

On April 12, 2007, two articles were published by the J-TAC, TSU's university paper. These articles stated that TSU had underreported forcible sex offense and burglary crime statistics for several years.

On May 22, 2007, TSU published a revised version of its 2006 annual security report. The revised report contained the following revised crime statistics for the 2003, 2004, and 2005 calendar years:

	2003 / 2004 / 2005			
	On Campus	Residence Halls	Non-Campus	Public Property
Murder/Non-negligent manslaughter	0/0/0	0/0/0	0/0/0	0/0/0
Negligent manslaughter	0/0/0	0/0/0	0/0/0	0/0/0
Sex offenses - Forcible	0/1/2	0/1/2	0/0/0	0/0/0
Sex offenses - Non-forcible	0/0/0	0/0/0	0/0/0	0/0/0
Aggravated assault	0/0/0	0/0/0	0/0/0	0/0/0
Robbery	1/0/0	0/0/0	0/0/0	0/0/0
Burglary	21/32/11	19/30/8	0/0/1	0/0/0
Motor vehicle theft	0/0/4	0/0/4	0/0/0	0/0/0
Arson	0/0/0	0/0/0	0/0/0	0/0/0
Any other crime	0/0/0	0/0/0	0/0/0	0/0/0
Arrests for liquor law violations	33/15/39	27/12/21	0/0/0	10/3/8
Arrests for drug law violations	7/11/2	5/6/1	0/0/0	5/1/0
Arrests for illegal weapons possession	0/0/0	0/0/0	0/0/0	3/1/2
Referrals for liquor law violations	20/9/30	19/6/26	0/0/0	2/0/0
Referrals for drug law violations	2/3/2	2/2/2	0/0/0	0/0/0
Referrals for illegal weapons possession	0/0/0	0/0/0	0/0/0	0/0/0

During the program review, TSU officials and police department personnel stated that their understanding of Clery Act requirements was incomplete when the crime statistics for the 2006 annual security report were compiled, but that the crime statistics were revised after learning more about the Clery Act reporting requirements.

TSU's revised 2006 annual security report contained three (3) forcible sex offenses (discussed below), one (1) robbery and 35 burglaries that had not been previously reported. In addition, the number of arrests for liquor and drug law violations increased from 86 to 108.

Although TSU's revised 2006 annual security report had more accurate and complete crime statistics than the original report, the Department's review identified additional reportable incidents.

Sex Offenses – Under-reporting

TSU's original 2006 annual security report did not contain any forcible sex offenses for calendar years 2003, 2004, or 2005. When TSU revised its statistics for the 2006 annual security report, one (1) forcible sex offense was included for the 2004 calendar year, and two (2) forcible sex offenses were included for the 2005 calendar year. These three (3) offenses correspond to the following incident reports.

20041113-01332
20050122-01446
20050129-01464

Burglary – Under-reporting

The revised 2005 calendar year statistics contained 12 burglaries (11 on campus and one (1) on non campus). However, the Department identified 16 burglaries in the following crime incident reports:

20050106-01415
20050118-01439
20050218-01506
20050404-01561
20050416-01581
20050428-01598
20050429-01600
20050429-01603
20050505-01607
20050517-01613
20050531-01619
20050721-01659
20050713-01751
20051006-01754
20051119-01845
20051121-01848

Drug Law Violation Arrests – Under-reporting

The revised 2005 calendar year statistics contained two (2) drug law violation arrests. However, the Department identified eight (8) drug law violation arrests in the following crime incident reports:

20050221-01509	2 arrests
20050517-01614	1 arrests
20050915-01716	1 arrests

20051204-01860	3 arrests
20051212-01877	1 arrests

Drug Law Violation Referrals – Under-reporting

The revised 2005 calendar year statistics contained two (2) referrals for drug law violation. However, the Department identified four (4) referrals for drug law violation in the following crime incident report:

20050907-01703	4 referrals
----------------	-------------

It appears that TSU used incident report 20050221-01509 for its count of two (2) referrals for drug law violations. However, both offenders mentioned in that report were arrested for drug law violations and, therefore, would not count toward referrals also.

Liquor Law Violation Arrests - Possible Over-reporting

TSU may have over-reported arrest crime statistics for liquor law violations.

TSU listed 37 arrests for its 2005 liquor law violations. However, the Department identified only 34 arrests:

<i>Incident Report</i>	<i>Arrests</i>
20050113-01430	1
20050123-01448	1
20050123-01449	1
20050123-01450	1
20050205-01476	1
20050206-01479	1
20050225-01522	1
20050330-01553	4
20050616-01636	1
20050729-01666	5
20050713-01651	1
20050828-01683	1
20050902-01694	1
20050902-01695	1
20050912-01711	1
20050917-01721	1
20050919-01722	2
20050924-01732	1
20051007-01756	2
20051102-01810	2
20051114-01833	1

20051201-01857	1
20051209-01874	1
20051229-01889	1

Total	34
-------	----

It appears that TSU's over-reporting is due to the following:

20051012-01767

Three minors were arrested for minors in possession. However, this incident did not occur in any location for which TSU must report.

Liquor Law Violation Referrals - Possible Over-reporting

TSU may have over-reported referral crime statistics for liquor law violations.

TSU listed eight (8) referrals for disciplinary action for its 2006 liquor law violations. However it appears that TSU may have over-reported two (2) referrals:

20060303-01972

Two minors were arrested. One was cited for driving under the influence and the other for public intoxication. Both were also referred for disciplinary action. Neither driving under the influence or public intoxication are Clery-reportable violations, for arrests or for disciplinary action referrals.

Drug Law Violation Arrests and Referrals - Possible Over-reporting

TSU listed nine (9) arrests and seven (7) disciplinary action referrals for its 2006 drug law violations. However, it appears that TSU may have over-reported one (1) arrest and (1) referral. The Department identified the following arrests and referrals:

<i>Incident Report</i>	<i>Arrests</i>	<i>Referrals</i>
20060119-01911	0	4
20060220-01955	1	0
20060222-01960	0	1
20060227-01965	2	0
20060306-01977	1	0
20060525-02057	0	1
20061003-02159	3	0
20061212-02225	1	0
Total	8	6

It appears that TSU's over-reporting is due to the following:

20060516-02052

A stalk of marijuana was found in a vacated apartment. It appears this incident was included as a referral. However, no individual was arrested or referred for disciplinary action.

20061212-02225

The narrative for this report indicates that only one person was arrested for a drug law violation. However, two suspects are listed. TSU's count of 9 drug law violations arrests is one too many unless both suspects in this incident report are counted as arrests.

Illegal Weapons Possession – Over-reporting

TSU may have over-reported crime statistics for illegal weapons possession.

TSU listed two (2) arrests for illegal weapons possession in its 2005 crime statistics but only one (1) was required to be reported.

20051027-01795

The narrative for this report indicates that the incident did not occur in any location for which TSU must report.

Required Action: *TSU must review its crime incident reports to determine whether it under-reported its 2005 calendar year statistics for:*

Burglary

Drug Law Violation Arrests

Drug Law Violation Referrals

If TSU incorrectly omitted an incident, it must revise the crime statistics in its current annual security report. In addition, TSU must contact the Department's Campus Crime Help Desk at (800) 435-598 [sic]¹ and request that the crime statistics for TSU be amended and reflected on the Department's public website. However, 2005 statistics cannot be changed by institution so a caveat for each category for which statistics were under-reported for calendar year 2005 must be added. For example, under Criminal Offenses - On campus, the caveat would read:

Line G (Burglary) should read 15 for 2005.

Please notify this office when all necessary caveats have been submitted to the Department.

¹ Should read (800) 435-5985

If TSU believes any incident identified by the Department should not be counted for Clery Act purposes, please provide an explanation of how that determination was made.

TSU is not required to take any action or to respond to the information on possible over-reporting of crime statistics. That information is provided only for information purposes to assist TSU in accurately compiling crime statistics.

TSU's Response: TSU concurred with the Department that it under-reported the number of burglaries, drug law violation arrests, and drug law referrals that occurred in the 2005 calendar year. TSU agreed that 16 burglaries, 8 drug law violation arrests, and 4 drug law referrals occurred in the 2005 calendar year.

TSU corrected the crime statistics in its annual security report to reflect the correct number of incidents (<http://www.tarleton.edu/site/documents/clervact.pdf>). In addition, TSU updated the crime statistics information submitted to the Department (<http://ope.ed.gov/security/>).

Final Determination: TSU complied with the requirements of the program review report and corrected its crime statistics to include the following under-reported incidents in its crime statistics for the 2005 calendar year:

- Four (4) burglaries,
- Six (6) drug law violation arrests, and
- Two (2) drug law violation referrals.

The Department notes that TSU revised its 2006 annual security report, which included 2003, 2004, and 2005 calendar year crime statistics, in May 2007, prior to the program review. This May 2007 revision increased the number of burglaries by 35 incidents, and the number of arrests for alcohol and liquor law violations by 22 incidents. The May 2007 revision also included one (1) robbery and three (3) forcible sex offenses that had been improperly excluded.

TSU has improved its Clery Act compliance. However, because of the non-compliance with Clery Act requirements, this FPRD is being referred to the Department's Administrative Actions and Appeals Division (AAAD) for consideration of possible adverse administrative action. If AAAD initiates any action, a separate notification will be provided which will include information on institutional appeal rights and procedures to file an appeal.



RECEIVED APR 14 2009

University Police

Box T-0560, Stephenville, Texas 76402
(254) 968-9002 FAX (254) 968-9494

April 7, 2009

Mr. Jesus Moya, U.S. Department of Education
1999 Bryan Street, Suite 1410
Dallas, Texas 75201-6817

Dear Jesus,

Regarding Program Review Report OPE ID: 00363100; PRCN: 200830626734, a copy of the report was received on February 20, 2009. The report states that the Tarleton State University Police Department under-reported burglaries, Drug Law Violation Arrests, and Drug Law Violation Referrals in Calendar Year 2005.

Burglaries

Program Review Report OPE ID: 00363100; PRCN: 200830626734 identifies a total of sixteen (16) burglaries, as opposed to the twelve (12) that were reported by the T.S.U.P.D. The report listed the following case numbers as burglaries:

20050106-01415

20050118-01439

20050218-01506

20050404-01561

20050416-01581

20050428-01598

20050429-01600

20050429-01603

20050505-01607

20050517-01613

20050531-01619

20050721-01659

20051004-01751

20051006-01754

20051119-01845

20051121-01848

The above-numbered reports were printed and reviewed carefully. The result of this review is that a total of sixteen (16) did in fact occur, and that the Department of Education is correct in their assertion that the T.S.U.P.D. under-reported burglaries in Calendar year 2005.

Drug Law Violation Arrests

Program Review Report OPE ID: 00363100; PRCN: 200830626734 identifies a total of eight (8) arrests for drug law violation in Calendar Year 2005, as opposed to two (2) arrests reported by the T.S.U. Police Department. The report listed the following case numbers as arrests for drug law violations:

20050221-01509	2 arrests
20050517-01614	1 arrest
20050915-01716	1-arrest
20051204-01860	3-arrests
20051212-01877	1 arrest

The above-numbered reports were printed and reviewed carefully. The result of this review is that a total of eight (8) arrests for drug law violations did in fact occur, and that the Department of Education is correct in their assertion that the T.S.U.P.D. under-reported the number of arrests for drug law violations in Calendar Year 2005.

Drug Law Violation Referrals

Program Review Report OPE ID: 00363100; PRCN: 200830626734 identifies a total of four (4) referrals for drug law violations in Calendar Year 2005, as opposed to two (2) a referrals reported by the T.S.U. Police Department. The report listed the following case numbers as arrests for drug law violations:

20050907-01703

4 referrals

The above-numbered report was printed and reviewed carefully. The result of this review is that a total of four (4) referrals for drug law violations did in fact occur, and that the Department of Education is correct in their assertion that the T.S.U.P.D. under-reported the number of drug law violation referrals in Calendar Year 2005.

Corrective Measures

The following corrective measures have been completed:

1. A report containing the correct number of burglaries, arrests for drug law violations, and referrals for drug law violations has been faxed to the Department of Education (see attachment).
2. The Clery Report for Calendar year 2005 on the Tarleton State University web site has been corrected (see attachment).
3. The link to the Clery Report (on the Tarleton P.D. website) now links directly to the Clery Report on the Tarleton State University website:

<http://www.tarleton.edu/site/documents/cleryact.pdf>

Sincerely,



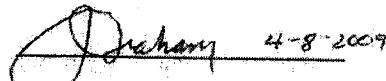
Chief Justin Williams

Tarleton State University Police Department



F. Dominic Dottavio, PhD

President, Tarleton State University



Mr. Jerry Graham

Vice President,

Finance and Administration

Get data for one institution/campus

New Search

Step 1. Institution/Campus Search (Redefine Search Criteria)

Step 2. Select Campus (Search Result)

Step 3. View Data

Tarleton State University

OPE ID: 00363100

1333 W. Washington

Stephenville, TX 76401-0000

For more information about this institution,
visit www.tarleton.edu

Campus: Main Campus

General Information

1333 W. Washington

STEPHENVILLE, TX 76402-0000

Security Officer Information

Security Office: Justin Williams

Title: Director Police Department

Box T- 0560

STEPHENVILLE, TX 76402

Phone: 254-968-9002

Residence Halls

This campus provides On-Campus housing.

Residence halls statistics are a subset of On-Campus statistics.

Local Police Crime Statistics

Local statistics are included with the campus's statistics.

Criminal Offenses

Hate Crimes

Arrests and Disciplinary Actions

The crime data reported by the institutions have not been subjected to independent verification by the U.S. Department of Education. Therefore, the Department cannot vouch for the accuracy of the data reported here.

Criminal Offenses - On campus

Criminal offense	Total criminal offenses on campus		
	2005	2006	2007
a. Murder/Non-negligent manslaughter	0	0	0
b. Negligent manslaughter	0	0	0
c. Sex offenses - Forcible	2	2	1
d. Sex offenses - Non-forcible (Include only incest and statutory rape)	0	0	0
e. Robbery	0	0	0
f. Aggravated assault	0	0	0
g. Burglary	11	15	21
h. Motor vehicle theft	4	2	1
i. Arson	0	0	0

Caveat:

2/09 - 2005 - Line g. should read 15 to reflect correction of miscount..

Criminal Offenses - On campus - Residence Halls

Criminal offense	Total criminal offenses on campus in residence halls		
	2005	2006	2007
a. <u>Murder/Non-negligent manslaughter</u>	0	0	0
b. <u>Negligent manslaughter</u>	0	0	0
c. <u>Sex offenses - Forcible</u>	2	2	1
d. <u>Sex offenses - Non-forcible</u> (Include only incest and statutory rape)	0	0	0
e. <u>Robbery</u>	0	0	0
f. <u>Aggravated assault</u>	0	0	0
g. <u>Burglary</u>	8	12	16
h. <u>Motor vehicle theft</u>	4	0	0
i. <u>Arson</u>	0	0	0

Caveat:

2/09 - 2005 - Line g. should read 12 to reflect correction of miscount.

Criminal Offenses - Noncampus

Criminal offense	Total criminal offenses on noncampus		
	2005	2006	2007
a. <u>Murder/Non-negligent manslaughter</u>	0	0	0
b. <u>Negligent manslaughter</u>	0	0	0
c. <u>Sex offenses - Forcible</u>	0	0	0
d. <u>Sex offenses - Non-Forcible</u> (Include only incest and statutory rape)	0	0	0
e. <u>Robbery</u>	0	0	0
f. <u>Aggravated assault</u>	0	0	0
g. <u>Burglary</u>	1	3	0
h. <u>Motor vehicle theft</u>	0	0	1
i. <u>Arson</u>	0	0	0

Caveat:

Criminal Offenses - Public Property

Criminal offense	Total criminal offenses on public property		
	2005	2006	2007
a. <u>Murder/Non-negligent manslaughter</u>	0	0	0
b. <u>Negligent manslaughter</u>	0	0	0
c. <u>Sex offenses - Forcible</u>	0	0	0
d. <u>Sex offenses - Non-forcible</u> (Include	0	0	0

Get data for one institution/campus

[New Search](#)

Step 1. Institution/Campus Search (Redefine Search Criteria)

Step 2. Select Campus (Search Result)

Step 3. View Data

Tarleton State University

OPE ID: 00363100

1333 W. Washington

Stephenville, TX 76401-0000

For more information about this Institution,
visit www.tarleton.edu

Campus: Main Campus

General Information

1333 W. Washington

STEPHENVILLE, TX 76402-0000

Security Officer Information

Security Office: Justin Williams

Title: Director Police Department

Box T- 0560

STEPHENVILLE, TX 76402

Phone: 254-968-9002

Residence Halls

This campus provides On-Campus housing.

Residence halls statistics are a subset of On-Campus statistics.

Local Police Crime Statistics

Local statistics are included with the campus's statistics.

[Criminal Offenses](#)

[Hate Crimes](#)

[Arrests and Disciplinary Actions](#)

The crime data reported by the institutions have not been subjected to independent verification by the U.S. Department of Education. Therefore, the Department cannot vouch for the accuracy of the data reported here.

Arrests - On campus

Law Violation	Total arrests on campus		
	2005	2006	2007
a. <u>Illegal weapons possession</u>	0	0	0
b. <u>Drug law violations</u>	2	8	3
c. <u>Liquor law violations</u>	29	9	11

Caveat:

2/09 - 2005 - Line b. should read 8 to reflect correction of miscount.

Arrests - On campus - Residence Halls

Law Violation	Total arrests on campus in residence halls		
	2005	2006	2007
a. <u>Illegal weapons possession</u>	0	0	0
b. <u>Drug law violations</u>	1	5	2

c. Liquor law violations	21	7	7
--------------------------	----	---	---

Caveat:

3/09 - 2005 - Line b. should read 3 to reflect correction of miscount.

Disciplinary Actions - On campus

Law Violation	Number of persons referred for Disciplinary Action on campus		
	2005	2006	2007
a. <u>Illegal weapons possession</u>	0	0	1
b. <u>Drug law violations</u>	2	7	10
c. <u>Liquor law violations</u>	30	6	39

Caveat:

2/09 - 2005 - Line b. should read 4 to reflect correction of miscount.

Arrests - Noncampus

Law Violation	Total arrests on noncampus		
	2005	2006	2007
a. <u>Illegal weapons possession</u>	0	0	0
b. <u>Drug law violations</u>	0	1	0
c. <u>Liquor law violations</u>	0	1	8

Caveat:**Disciplinary Actions - Noncampus**

Law Violation	Number of persons referred for Disciplinary Action on noncampus		
	2005	2006	2007
a. <u>Illegal weapons possession</u>	0	0	0
b. <u>Drug law violations</u>	0	0	0
c. <u>Liquor law violations</u>	0	0	3

Caveat:**Arrests - Public Property**

Do NOT include drunkenness or driving under the influence in Liquor law violations.

Crime	Total arrests on public property		
	2005	2006	2007
a. <u>Illegal weapons possession</u>	2	0	0
b. <u>Drug law violations</u>	0	0	0
c. <u>Liquor law violations</u>	8	1	7

Tartleton State University - Stephenville

OFFENSE	ON CAMPUS			** RESIDENTIAL FACILITIES			# NON-CAMPUS			PUBLIC PROPERTY			TOTAL		
	2005	2006	2007	2005	2006	2007	2005	2006	2007	2005	2006	2007	2005	2006	2007
MURDER / NON-NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
SEX OFFENSES, FORCIBLE	2	2	1	2	2	1	0	0	0	0	0	0	2	2	1
SEX OFFENSES, NON-FORCIBLE	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
BURGLARY	15	15	21	12	12	16	1	3	0	0	0	0	16	18	21
MOTOR VEHICLE THEFT	4	2	1	4	0	0	0	0	1	0	0	0	4	2	2
ARSON	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
LIQUOR LAW ARRESTS	29	9	11	21	7	7	0	1	8	8	1	7	37	11	19
LIQUOR LAW VIOLATIONS REFERRED FOR DISCIPLINARY ACTION	30	6	39	26	6	38	0	0	3	0	2	1	30	8	49
DRUG LAW ARRESTS	8	8	3	3	5	2	0	1	0	0	0	0	8	9	4
DRUG LAW VIOLATIONS REFERRED FOR DISCIPLINARY ACTION	4	7	10	4	7	8	0	0	0	0	0	0	4	7	10
ILLEGAL WEAPONS POSSESSION ARRESTS	0	0	0	0	0	0	0	0	0	2	0	0	2	0	0
ILLEGAL WEAPONS POSSESSION VIOLATIONS REFERRED FOR DISCIPLINARY ACTION	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
TOTAL	92	49	88	72	39	72	1	5	12	10	3	8	103	57	108

**CRIMES REPORTED IN THE RESIDENTIAL FACILITIES COLUMN ARE INCLUDED IN THE ON-CAMPUS CATEGORY.

Non-campus locations include the Dora Lee Langdon Cultural and Education Center in Granbury, Fort Worth ISD, Grapevine ISD, Hill College in Cleburne, Howard Payne University in Brownwood, Tartleton State University Hurnwell Ranch, McLennan County Community College University Center in Waco, Tartleton State University Farm, W.K. Gordon Center for Industrial History Museum and Gallery in Thurber, and Weatherford College



2005 Clery Report (Corrections)

OFFENSE	ON-CAMPUS	RESIDENTIAL	NON-CAMPUS	PUBLIC PROPERTY	TOTAL
MURDER/NON-NEGLIGENT MANSLAUGHTER					
NEGLIGENT MANSLAUGHTER	2	2			2
SEX OFFENSES (FORCIBLE)					
SEX OFFENSES (NON-FORCIBLE)					
ROBBERY					
AGGRAVATED ASSAULT					
BURGLARY	15	12	1		16
MOTOR VEHICLE THEFT	4	4			4
ARSON					
LIQUOR LAW ARRESTS	29	21		8	37
LIQUOR LAW VIOLATION REFERRALS	30	28			30
DRUG LAW ARRESTS	8	4			8
DRUG LAW REFERRALS	4	4			4
ILLEGAL WEAPONS POSSESSION ARRESTS		3		2	2
ILLEGAL WEAPONS REFERRALS					
TOTAL	92	73	1	10	103

Reviewed by:

on

003631 Tarleton State University 1333 West Washington Steph

1

01/2009

2007-2008

\$38,568,635

\$38,568,635

\$17,113,726

\$16,861,961

\$4,592,948

\$0

\$0

\$0

\$0

\$46,393,573

Total Perkins \$7,360,551

Total Campus Based \$464,387

ES 100 \$339,496

ES 100 \$124,891

Perkins \$0

Medians

